

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>A.G., a minor child; D.A., a minor child;</b>	)	
<b>A.L., a minor child; M.K., a minor child;</b>	)	
<b>and M.H., a minor child;</b>	)	
	)	
<b>PLAINTIFFS,</b>	)	
	)	<b>CASE NO: 2:05-CV-1090-W</b>
<b>VS.</b>	)	
	)	
<b>AUTAUGA COUNTY BOARD OF</b>	)	
<b>EDUCATION; JOSEPH BUTLER</b>	)	
<b>and TERRY WRIGHT,</b>	)	
	)	
<b>DEFENDANTS.</b>	)	

**MOTION FOR ENTRY  
OF AN AGREED PROPOSED PROTECTIVE ORDER**

COME NOW defendants Autauga County Board of Education and Joseph L. Butler, and respectfully move for entry of the attached proposed Protective Order. In further support of this Motion, the defendants state as follows:

1. The parties agree that a protective order should be in place since the plaintiffs are only identified by their initials in the Complaint and their names or other identifying information may need to be disclosed during this case.
2. Further, a Protective Order will need to be entered in order for the Autauga County Board of Education or any employee to disclose any information or records on any minor plaintiff student, pursuant to the Family Education Rights and Privacy Act (Buckley Amendment), 20 U.S.C. § 1232(g).
3. Attached to this motion is the agreed upon proposed protective order.

WHEREFORE, PREMISES CONSIDERED, the defendants respectfully request entry of the

attached agreed upon proposed protective order.

Respectfully submitted,  
s/Mark S. Boardman  
Mark S. Boardman (ASB-8572-B65M)  
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Counsel for the Autauga County Board of  
Education and Joseph L. Butler  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have on this **28<sup>th</sup>** day of **April, 2006**, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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s/Mark S. Boardman  
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